

FILED

1 ALEJANDRA ODILIA GRANILLO

2 1232 SOUTH GLENDALE AVE.

3 GLENDALE, CA. 91205

4 TEL: 818-662-0722

5 IN PROSE

2013 OCT 18 AM 10:34

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY: 

 ORIGINAL

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
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16 INOVATION SPORTS MANAGEMENT,

17 INC, .

18
19 Plaintiff,

20 vs.

21 ALEJADRA ODILIA GRANILLO

22 Defendant.
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Case No.: 2:13CV6588 -TJH (PLAx)

ANSWER TO COMPLAINT

25 TO THE HONORABLE JUDGE AND ATTORNEY OF RECORD,
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ORIGINAL

1 Defendant Alejandra Odilia Granillo, individual and d/b/a a EL
2 SABROCITO RESTAURANTE Y PUPUSERIA A/K/A, RESTAURANTE PUPUSERIA EL
3 SABROCITO responds to allegations of the Complaint on file herein,
4 affirms, denies and alleges as follow:

- 5 1. Answering the allegations on Paragraph 1-5, Defendant
6 admits each and every one of the allegations contained in
7 said paragraph.
8
- 9 2. Answering the allegations of Paragraph 6, Defendant
10 alleges that she has no information or belief sufficient to
11 allow her to answer and so she denies each and every
12 allegation contained in said paragraph.
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- 14 3. Answering the allegations of Paragraphs 7-10, Defendant
15 admits each and every one of the allegations contained in
16 said paragraphs.
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- 18 4. Answering the allegations of Paragraphs 11-12, Defendants
19 denies each and every allegation contained in said
20 paragraphs.
21
- 22 5. As to count I, the Defendant alleges that she did not
23 knowingly, willfully or for the purpose of direct or in
24 direct commercial advantage or private, intercept, receive,
25 publish, divulge, display and /or exhibit the Program at her
26 Commercial establishment in Glendale, California located at
27 1232 South Glendale Avenue, Glendale, CA. 91205.
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1 6. Answering the allegations of Paragraphs 13-16, Defendant
2 Denies each and every allegation contained in said
3 paragraph.

4 7. Answering the allegations of the Paragraphs 17, Defendant by
5 reference her admission and denial to paragraph 1-16 of the
6 Complaint.

7 8. Answering the allegations of Paragraph 18, Defendant without
8 sufficient knowledge or information to either admit or deny
9 the allegations contained in that paragraph, and on that
10 basis denies those allegations.

11 9. Answering the allegations of Paragraph 19-20, Defendant
12 without sufficient knowledge or information to either admit
13 or deny the allegations contained in said paragraphs.

14 10. Answering the allegations of Paragraphs 21-31, Defendant
15 denies any allegations contained in said paragraphs.

16 11. Answering to allegations contained in Paragraphs 32-36,
17 Defendant denies any allegations contained in said
18 paragraph.

19 12. Answering the allegations on Paragraphs 37-38, Defendant
20 is without sufficient knowledge or information to either
21 admit or deny the allegations contained in said paragraphs.

22 13. Answering the allegations of Paragraphs 39-41, Defendant
23 denies any allegations contained in said paragraphs.
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1 AFFIRMATIVE DEFENSE

2 Without admitting that she has the burden of proof as to any
3 of the following defenses, Alejandra Odilia Granillo alleges
4 as follows.

5 FIRST AFFIRMATIVE DEFENSE

6 (Failure to State Claim)

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8 1. The Complaint and every claim for relief contained
9 therein fails to state a claim upon which relief may be
10 granted.

11 SECOND AFFIRMATIVE DEFENSE

12 (Laches)

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14 2. The Complaint and every claim for relief contained
15 therein is barred by doctrine of laches.

16 THIRD AFFIRMATIVE DEFENSE

17 (Unclean Hands)

18 3. The Complaint and every claim for relief contained
19 therein is barred by the doctrine of unclean hands.

20 PRAYER

21 Alejandra Odilia Granillo prays as follow:

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23 1. That Plaintiff take nothing by way of its Complaint
24 and that judgment be entered in favor of Granillo.

25 2. For cost of suit.

26 3. For such other and further relief as the Court may
27 deem just proper.
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2 DATE: October 18, 2013



3 Alejandra Odilia Granillo
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